

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and HELEN
LOVELACE, Individually, and as Parents
of BRETT LOVELACE,

Deceased,

Plaintiffs,

vs.

NO. 2:13-cv-02289 dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

**PLAINTIFFS' SECOND AMENDED NOTICE TO TAKE VIDEOTAPED DISCOVERY
DEPOSITION OF BABU RAO PAIDIPALLI, M.D.**

TO: Albert G. McLean/David Cook
The Hardison Law Firm
119 S. Main Street, Suite 800
Memphis, TN 38103

Please take Notice that the Plaintiffs in this action will take the audio-visual and stenographical deposition of the Defendant, Babu Rao Paidipalli, M.D., pursuant to Rule 30 of the Federal Rules of Civil Procedure, before a Notary Public or before some other officer authorized by law to administer oaths, and will continue from day to day until completed as follows:

DEPONENT: Babu Rao Paidipalli, M.D.
DATE: Thursday, January 9, 2014
TIME: 10:00 a.m.

PLACE: The Hardison Law Firm
119 S. Main Street, Suite 800
Memphis, TN 38103

Respectfully submitted,

HALLIBURTON & LEDBETTER

/s/ Mark Ledbetter
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

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This 6th day of January, 2014.

/s/ Mark Ledbetter
MARK LEDBETTER, Certifying Attorney